

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**WELLS FARGO BANK, N.A.'S NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Wells Fargo Bank, N.A ("Creditor") by and through undersigned counsel, hereby submits
Notice to the Court of Rahsaan G Thomas ("Debtor") request for mortgage payment forbearance
based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 37 West Wyneva Street, Philadelphia, PA 19144.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the

forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)
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Attorneys for Creditor
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|------------------------------|---------------------|----------------------------|
| In re: | : | |
| | : | Case No.: 18-16902 |
| Rahsaan G Thomas | : | Chapter 13 |
| | : | Judge Eric L. Frank |
| Debtor(s) | : | * * * * * |
| | : | |
| Wells Fargo Bank, N.A | : | |
| | : | |
| | Movant, | : |
| vs | : | |
| | : | |
| Rahsaan G Thomas | : | |
| Sade Thomas | : | |
| | : | |
| William C. Miller | : | |
| | Respondents. | |

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A's Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

David M. Offen, Attorney for Rahsaan G Thomas, The Curtis Center, 601 Walnut Street, Suite 160 West, Philadelphia, PA 19106, dmo160west@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 15, 2020:

Rahsaan G Thomas, 37 W. Wyneva Street, Philadelphia, PA 19144

Rahsaan G Thomas and Sade Thomas, 37 West Wyneva Street, Philadelphia, PA 19144

DATE: May 15, 2020

/s/ Karina Velter

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